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9 **UNITED STATES DISTRICT COURT**

10 **DISTRCIT OF NEVADA**

11 Amanda Doell,

Case No.: 2:23-cv-1056-JCM-DJA

12 Plaintiff,

13 vs.
14 **Stipulation and [Proposed] Order TO
15 Extend Discovery Deadlines and
Amend Current Discovery Plan and
Scheduling Order (ECF No. 13)**

16 Cardenas Markets, LLC, a Foreign Limited-Liability
17 Company, dba Cardenas; Doe Manager; Does II
18 through X; and Roe Corporations I through X,
19 inclusive,

20 Second Request

21 Defendant.

22 The parties hereby stipulate and agree, subject to this Court's approval, to extend the current
23 discovery deadlines and amend the Discovery Plan and Scheduling order (ECF No. 13) by ninety
24 60) days. This is the first request to extend the discovery deadlines in this matter. The parties are in
25 agreement that the requested extension is in the interest of all parties to allow the parties to
26 efficiently litigate this case. The parties submit that this extension is sought in good faith and will
27 not unduly delay these proceedings.

28 **I. Discovery Completed To Date.**

- 29 a. Written discovery to Plaintiff;
- 30 b. Written Discovery to Defendant
- 31 c. Disclosure of Expert Witnesses

32 **II. Discovery Left to Be Completed.**

1 a. Deposition of Plaintiff.
 2 b. Deposition of Defendant's 30(b)(6) Representative.
 3 c. Deposition of percipient witnesses
 4 d. Disclosure of expert witnesses.

5 **III. Reasons for Requested Extension.**

6 The parties request a short 60 day extension because of pending motion work that requires
 7 an extension. Cardenas filed a motion for a protective order on Plaintiff's proposed 30(b)(6) topics
 8 (ECF No. 15). The Court set a hearing for March 26th (ECF No. 16). This is the day after discovery
 9 closes. Because the result of this hearing has an effect on the other depositions in this case, the
 10 parties request a short 60day extension to finish discovery and the pending motion work.

11 **IV. Current Deadlines and Requested Extension**

	Current	Proposed
Amending the Pleadings and Adding Parties	September 27, 2023	CLOSED
Initial Expert Disclosures	December 26, 2023	CLOSED
Rebuttal Expert Disclosures	January 25, 2024	CLOSED
Discovery Closes	March 25, 2024	May 24, 2024
Dispositive Motions	April 24, 2024	June 21, 2024
Pre-Trial Order, if no Dispositive Motions	May 24, 2024	July 19, 2024

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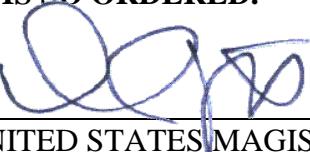
1 Therefore, the parties respectfully request that the Court enter an order approving the
2 proposed discovery schedule as set forth above.

4	 WILSON ELSER WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP	5	MOSS BERG INJURY LAWYERS
6	<u>/s/ Jonathan C. Pattillo, Esq.</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 7 Jonathan C. Pattillo, Esq. Nevada Bar No. 13929 8 Attorneys for Cardenas Markets, LLC	7	<u>/s/ Boyd B. Moss, Esq.</u> Boyd B. Moss III, Esq. Nevada Bar No. 8856 John C. Funk, Esq. Nevada Bar No. 9255 Attorneys for Amanda Doell

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10 **ORDER**

11 IT IS SO ORDERED.



12
13 UNITED STATES MAGISTRATE JUDGE

14 DATED: 3/4/2024

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